



# School Food Safety Program

School Nutrition Programs  
Office of School Support Services  
Michigan Department of Education

# Policy Memos

- o **School Food Safety Inspections (USDA)**
  - o December 16, 2004
- o **Administrative Policy #11 (MDE) re: 2 food safety inspections**
  - o March 18, 2005
- o **Food Safety Questions and Answers (USDA)**
  - o July 12, 2005
- o **School Food Safety Inspections (MDE)**
  - o June 14, 2007
- o **Food Safety Inspections in Non-Traditional School Settings (USDA)**
  - o December 19, 2007
- o **Responsibility to Request Food Safety Inspections (USDA)**
  - o September 19, 2008
- o **Enhancing the School Food Safety Program (USDA)**
  - o May 18, 2011
    - o Requires that the school food safety program based on HACCP principles be applied to any facility or part of a facility in which food is stored, prepared or served – includes classrooms.
- o **Food Safety Inspections in Service-Only Sites (USDA)**
  - o August 3, 2011
    - o Does not change the requirement for all institutions that meet the definition of “school” under the NSLP to obtain two inspections, even at service-only sites.
- o **Enhancing the School Food Safety Program Frequently Asked Questions (FAQ)**
  - o April 26, 2013
    - o Q&As regarding the school food safety requirements for schools participating in FNS programs.



# USDA Food Safety Regulation Summary

- Must have a food safety manual on site for every location serving food for a FNS Child Nutrition Program
- This manual must be specific to that site's operations (e.g., if BIC, must have an SOP for this)
- This manual must be updated annually
- 2 School Food Safety Inspections must be conducted or documented
- The results from the most recent inspection must be in a publicly visible location
- Temperature logs must be maintained
- Certain menu items may be saved for future consumption or placed on a share table.
- This is all IN ADDITION to food safety practices required under your food service license!

# The Picture of Food Safety

**FDA**

**MDARD**

- LHD

**USDA**

**MDE**

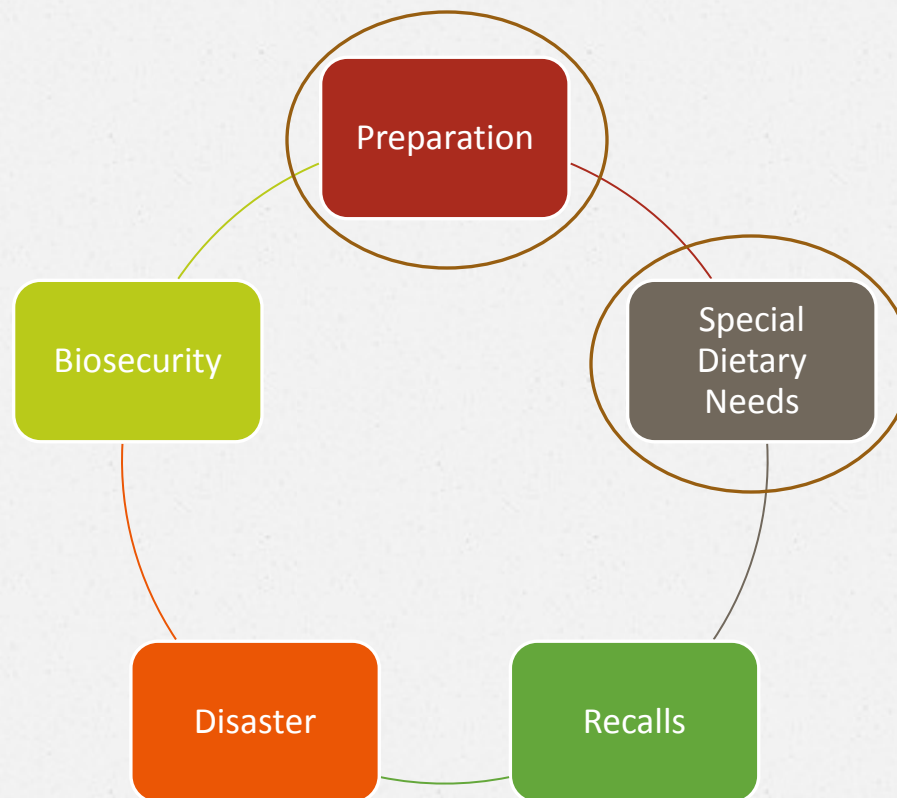
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# Defining School Food Safety





# Defining School Food Safety



# School Food Safety - **Preparation**

- o Primary responsibility of your Local Health Department through your food license.
- o Requirements of a School Food Safety Program
  - o Tools Available
- o Certified Food Manager
  - o Approved certifications
  - o Who is responsible in the event of an outbreak?
- o MI Specific Clarifications
  - o “Approved Source”

# School Food Safety – **Preparation**

## Requirements of a School Food Safety Program

The School Food Authority (SFA) is responsible for developing a comprehensive food safety program for their district, including a plan for every school food preparation and service site. A school food safety program must include the following elements:

- o Documented Standard Operating Procedures (SOPs)
- o Documenting menu items into one of three HACCP Process categories
- o Documenting Critical Control Points of food production
- o Monitoring
- o Establishing and documenting corrective actions
- o Recordkeeping
- o Reviewing and revising the overall food safety program



# School Food Safety – **Preparation**

## Requirements of a School Food Safety Program

- o *“Guidance for School Food Authorities: Developing a School Food Safety Program Based on the Process Approach to HACCP Principles.”* USDA FNS June 2005 (79 pages)
  - o <http://www.nfsmi.org/documentlibraryfiles/PDF/20080220092722.pdf>
- o *“Template for Developing a School Food Safety Program”,* National Food Service Management Institute, 2006 (22 pages)
  - o <http://www.nfsmi.org/documentlibraryfiles/PDF/20080207023632.pdf>
- o *“HACCP Based Standard Operating Procedures,”* National Food Service Management Institute, 2005 (115 pages)
  - o <http://www.nfsmi.org/documentlibraryfiles/PDF/20080207024226.pdf>

# School Food Safety – **Preparation** Certified Food Manager

- o There are 3 nationally accredited exams used by course providers and approved by MDARD:
  - o National Restaurant Association Educational Foundation (ServSafe) 800-765-2122
  - o National Registry of Food Safety Professionals 800-446-0257
  - o Thomson Prometric 800-624-2736



# School Food Safety – **Preparation** Certified Food Manager



The screenshot shows the Michigan Department of Agriculture & Rural Development website. The header includes the department's logo and name, along with the Michigan.gov logo. A navigation bar contains links to Michigan.gov Home, MDARD Home, Sitemap, Contact MDARD, Online Services, and eMDA. Below the navigation bar, there are links for Printer Friendly, Text Version, Text Size, and Share. The main content area is titled "Food Manager Certification" and includes a section for "Certified Food Manager" with a paragraph stating that many Michigan food establishments must employ at least one certified food manager by June 30, 2009. A link titled "Manager Certification Myths and Facts" is provided. The left sidebar contains links for Michigan Food Safety, Food Recalls, Resources for Consumers, Resources for Michigan's Food & Dairy Industry, and How to Start a Food Business. The right sidebar contains a search bar, a link to MI Business One Stop, and a list of related content including ServSafe Training for Food Service Staff and Miscellaneous Links to...

[http://michigan.gov/mdard/0,4610,7-125-50772\\_45851\\_45855-182605--,00.html](http://michigan.gov/mdard/0,4610,7-125-50772_45851_45855-182605--,00.html)

Who is responsible in the event of an outbreak?



# School Food Safety – **Preparation**

## MI Specific Clarifications

- o ServSafe says: “Purchase only from an ‘approved source’”
- o What does this mean in MI?

# School Food Safety – Preparation

## Defining “Approved Source”

### Checklists

- Iowa State
- Cornell
- UC Davis
- Penn State
- Initiates conversation

#### Checklist for Retail Purchasing of Local Produce

Name of Producer/Farm \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_  
Telephone \_\_\_\_\_ E-mail \_\_\_\_\_  
Total acres farmed \_\_\_\_\_ Availability of promotional materials YES NO  
Products to be purchased \_\_\_\_\_  
Is an insurance liability required YES (Dollar amount \_\_\_\_\_) NO  
Is the facility licensed and inspected to process products YES NO  
Are there acceptable substitutes available if an order cannot be filled YES NO

Production Practices	Yes	No	N/A
Are wells protected from contamination?			
If irrigation is used, what is its source? <input type="checkbox"/> Well <input type="checkbox"/> Stream <input type="checkbox"/> Pond <input type="checkbox"/> Municipal <input type="checkbox"/> Other _____			
What types of manures are used? <input type="checkbox"/> Raw manure <input type="checkbox"/> Composted <input type="checkbox"/> Aged <input type="checkbox"/> No manure is used			
Is raw manure incorporated at least 2 weeks prior to planting and/or 120 days prior to harvest?			
Is the manure application schedule documented with a copy submitted to the retail operation?			
Is land use history available to determine risk of product contamination (e.g., runoff from upstream, flooding, chemical spills, or excessive agricultural crop application)?			
Is the field exposed to runoff from animal confinement or grazing areas?			
Is land that is frequently flooded used to grow food crops?			
Are coliform tests conducted on soil in frequently flooded land?			
Are farm livestock and wild animals restricted from growing areas?			
Are portable toilets used in a way that prevents field contamination from waste water?			

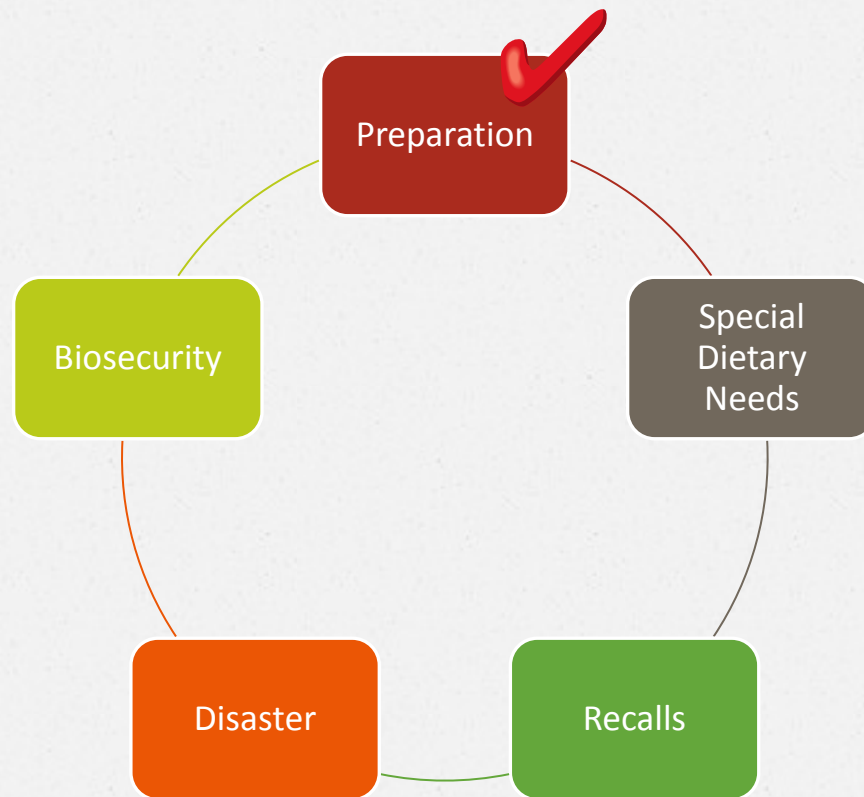
Product Handling	Yes	No	N/A
Are storage and packaging facilities located away from growing areas?			
Is there risk of contamination with manure?			
Are harvesting baskets, totes, or other containers kept covered and cleaned (with potable water) and sanitized before use?			
Is harvesting equipment/machinery that comes into contact with the products kept as clean as possible?			
Are product and non-product containers available and clearly marked?			
Is dirt, mud, or other debris removed from product before packing?			
Are food grade packaging materials clean and stored in areas protected from pets, livestock, wild animals, and other contaminants?			

Transportation	Yes	No	N/A
Is product loaded and stored to minimize physical damage and risk of contamination?			
Is transport vehicle well maintained and clean?			
Are there designated areas in transport vehicle for food products and non-food items?			
Are products kept cool during transit?			

PM 2046a March 2009

IOWA STATE UNIVERSITY  
University Extension

# Defining School Food Safety





# School Food Safety – **Special Dietary Needs**

## Laws and Regulations

- Rehabilitation Act of 1973
- Individuals with Disabilities Education Act (IDEA)
- Americans with Disabilities Act (ADA)
- U.S. Department of Agriculture's (USDA) nondiscrimination regulation (7 CFR 15b)
- FNS Instruction 783-2, Revision 2, *Meal Substitutions for Medical or Other Special Dietary Reasons*

# Disability

Anyone who has a physical or mental impairment, which substantially limits one or more of the major life activities, has a record of such impairment, or is regarded as having such an impairment.

# IDEA

- Disability
- Special education needed
- IEP completed
- Accommodations made

# Section 504

- Disability
- Special education not needed
- 504 plan completed
- Accommodations made



# Challenge Activity

- The principal wants to provide children with disabilities a serving area separate from the one where other children are being served. Is it appropriate to do this? Why or why not?

# Challenge Activity

- The school nurse comes to the cafeteria to tell you that there is a new student with an IEP that requires a full breakfast. Your school does not participate in the SBP. Do you have to provide the meal to this student? Why or why not?

# USDA Regulations and Guidance

Child with disability must have a licensed physician's statement that includes:

- o the child's disability;
  - o an explanation of why the disability restricts the child's diet;
  - o the major life activity affected by the disability;
  - o the food or foods to be omitted from the child's diet, and the food or choice of foods that must be substituted.
- 
- o MDE has a form available or you may use your own so long as all the above is included.



# Challenge Activity

- If the licensed physician's orders are to provide portion sizes twice the amount served to other children, do you have to provide the additional quantities? Why or why not?

# Challenge Activity

- As part of the therapy for a child with a disability, the licensed physician has required the child to consume six cans of cranberry juice a day. The juice is to be served at regular intervals, and some of these servings would occur outside of the normal school meal periods. Is the school food service required to provide all of the servings of juice?

# Challenge Activity

- o A student was in a serious accident and had to have his jaw wired shut for one month, which limits his ability to eat solid food. The doctor provides a statement of the disability that requires meals to be substituted with a specially purchased high calorie drink supplement. Are you required to accommodate this disability? Why or why not?



# USDA Regulations and Guidance

Child with medical conditions that are NOT disabilities must have a medical statement that includes:

- an identification of the medical or other special dietary condition which restricts the child's diet;
- the food or foods to be omitted from the child's diet; and the food or choice of foods to be substituted.

# Challenge Activity

- o A child has a life threatening allergy which causes an anaphylactic reaction to peanuts. The slightest contact with peanuts or peanut derivatives, usually peanut oil, could be fatal. To what lengths must the food service go to accommodate the child? Is it sufficient for the school food service to merely avoid obvious foods, such as peanut butter, or must school food service staff research every ingredient and additive in processed foods or regularly post all of the ingredients used in recipes?

# Challenge Activity

- A high school student approaches you and asks if he can have a special meal since he has high cholesterol. Are you obligated to fulfill this special dietary need? Why or why not?



# Accommodations

- Use food already purchased when possible
- May require special training
- May require professional help of a dietitian
- State agencies may be of assistance

# Challenge Activity

- Do you have to provide a modified meal to a child whose parents are strict vegetarians and want their child to be provided with vegetarian meals because they believe it is healthier than eating meat? Why or why not?

# Food Service Staff

- Keep confidentiality
- Provide substitutions and modifications
- Exercise care
- Document
- Do not overcharge
- Be consistent



# Challenge Activity

- When a student has a non-disabling milk allergy (such as an intolerance or aversion), can juice or water be substituted for the milk?

# Challenge Activity

- A child with a disability has a licensed physician's statement, which includes a menu with specific foods. One day, while making up the menu for this child, you realize that one of the food items on the special menu is out of stock. You have something similar on hand. Is it OK to make this substitution? Why or why not?

# Challenge Activity

- You receive a medical statement from a physician concerning a child with a disability but it does not specify food substitutions. You have another child with the same disability for whom you already prepare special meals. Can you use the same meal for this new child? Why or why not?



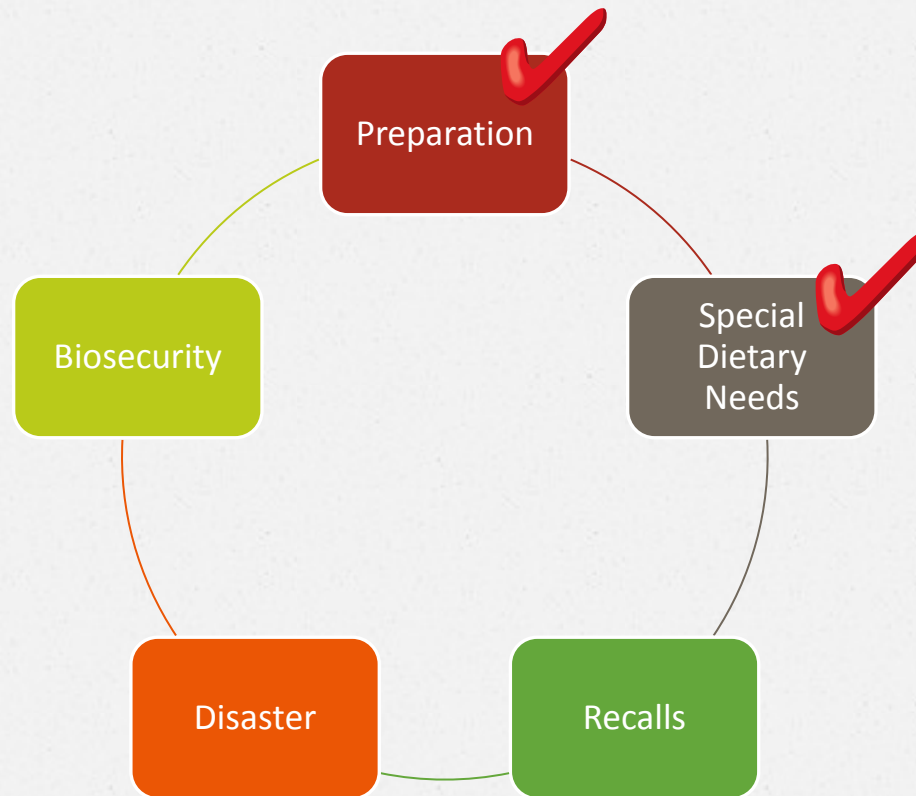
# Challenge Activity

- A school district has contracted with a FSMC to operate the school's food service. Is the FSMC obligated to accommodate children with disabilities?

# Challenge Activity

- Some schools purchase items from nationally recognized fast-food chains and sell these items on an "a la carte" basis. These items are frequently sold in a setting such as a kiosk which uses the chain's logo or otherwise advertises the product. What obligation, if any, does the fast-food chain have to provide alternative meals?

# Defining School Food Safety

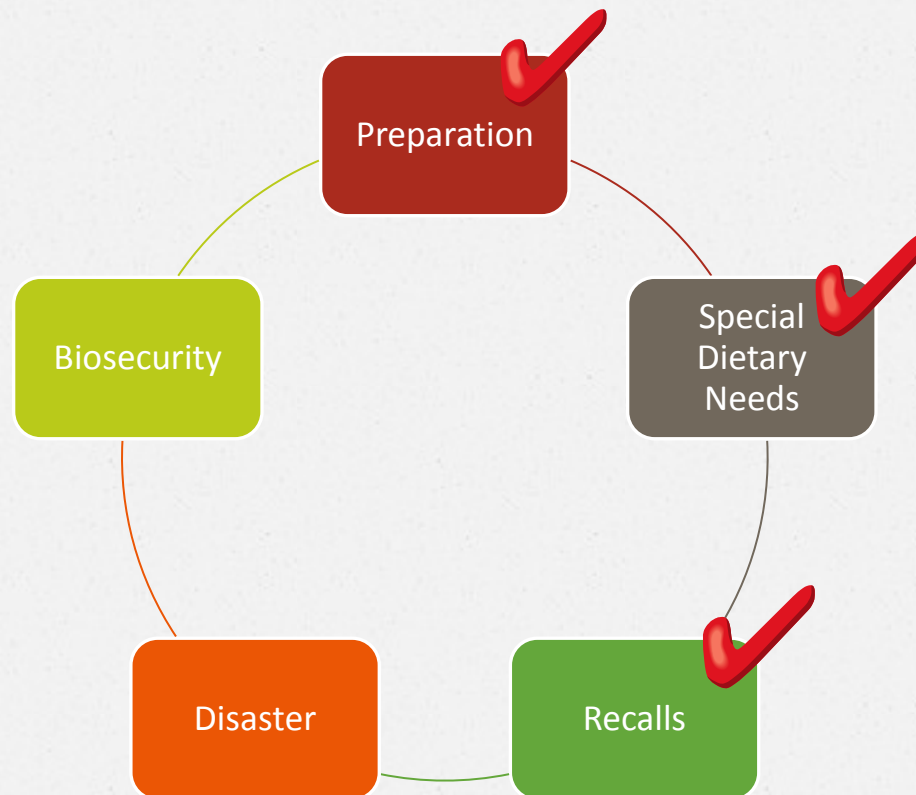




# School Food Safety - Recalls

- o Important note: MI does not have a mandatory recall authority; Recalls are typically voluntary by company
- o USDA Foods through MDE
  - o learns of recall via phone, fax, e-mail from the USDA's Rapid Alert System (RAS), food manufacturer, and/or the USDA's Web Based Supply Chain Management System (WBSCM)
  - o Works with purchasing consortia's to locate recalled product and to notify schools who may have received product
    - o may also utilize MEGS+ info to notify schools/agencies of any recalls pertaining to USDA Foods
- o Commercial Product
  - o MDARD works with companies to encourage them to do the right thing
    - o learns about recalls through: internal staff, FDA, USDA, Industry notifications, other state agencies, media
    - o then communicates through MDARD listserv, text alerts, Twitter, and Facebook accounts

# Defining School Food Safety

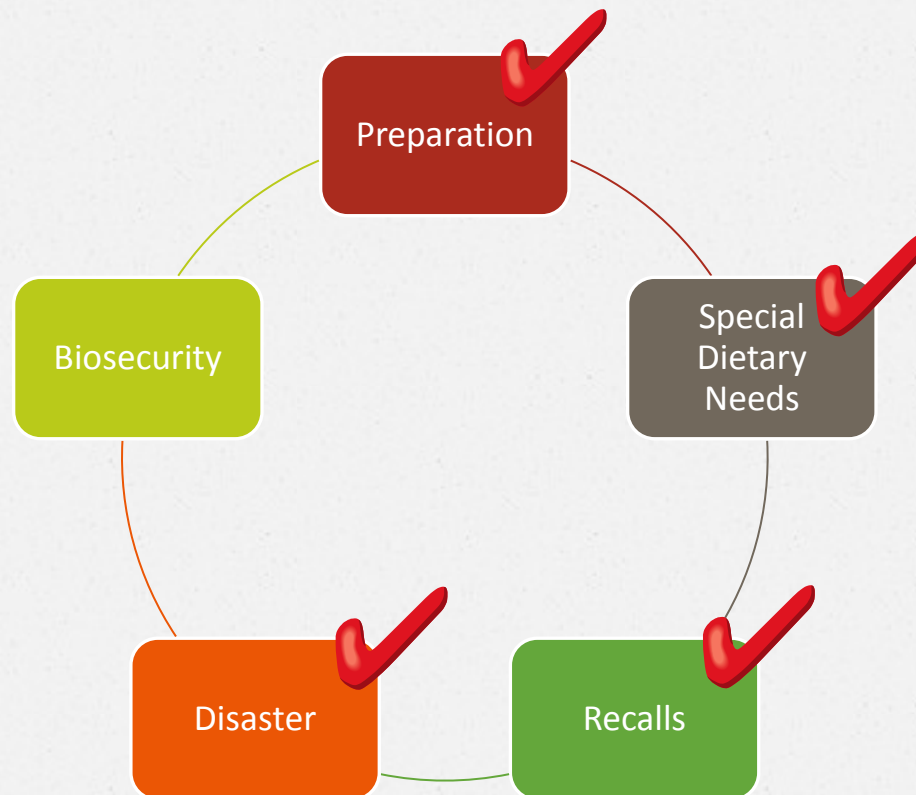


# School Food Safety - Disaster

- o Definition: Knowing what to do before, during and after an emergency as a critical part of being prepared
  - o Not Mandatory, highly encouraged
  - o Consider:
    - o Preparation
      - o Adequate food, water and other basic supplies
    - o Adequate food, water and other basic supplies
      - o Allergies
- o <http://www2.ed.gov/admins/lead/safety/emergencyplan/index.html>



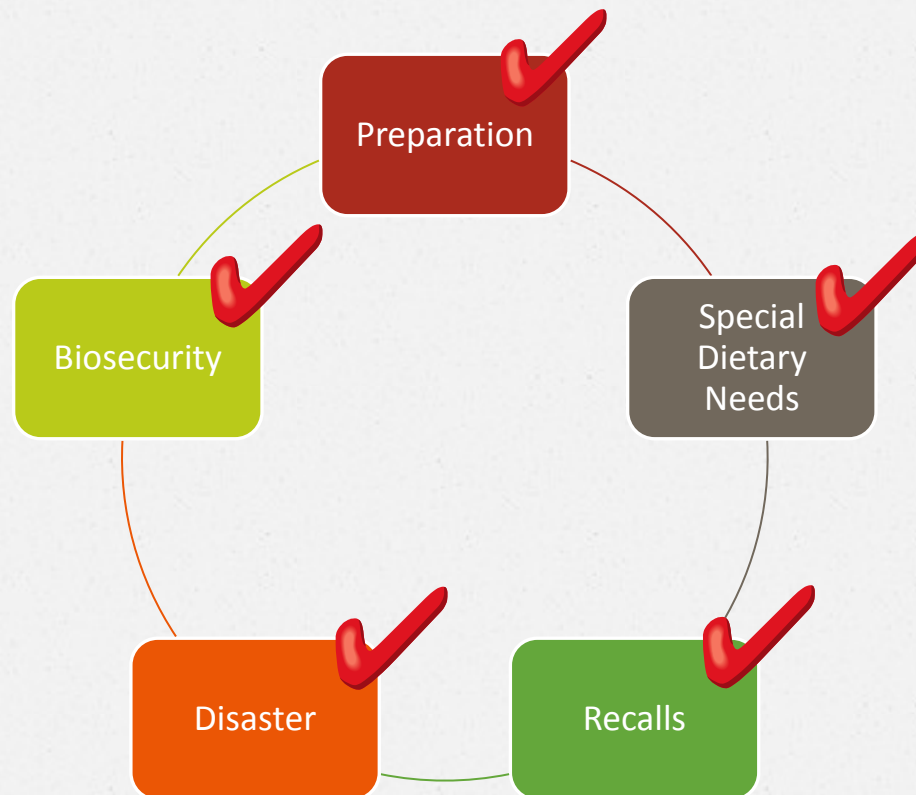
# Defining School Food Safety



# School Food Safety - Biosecurity

- o Definition: protecting the health of the children and adults in your school by strengthening the safety of your foodservice operation
  - o Not mandatory, highly encouraged
    - o Develop a team
    - o create a food biosecurity management plan  
<http://foodbiosecurity.nfsmi.org/index.php>
- o NSFMI has a table top exercise program available & funding to assist districts in conducting. Contact Aleshia Hall-Campbell at [alhall2@olemiss.edu](mailto:alhall2@olemiss.edu) or (800) 321-3054 for more information.

# Defining School Food Safety

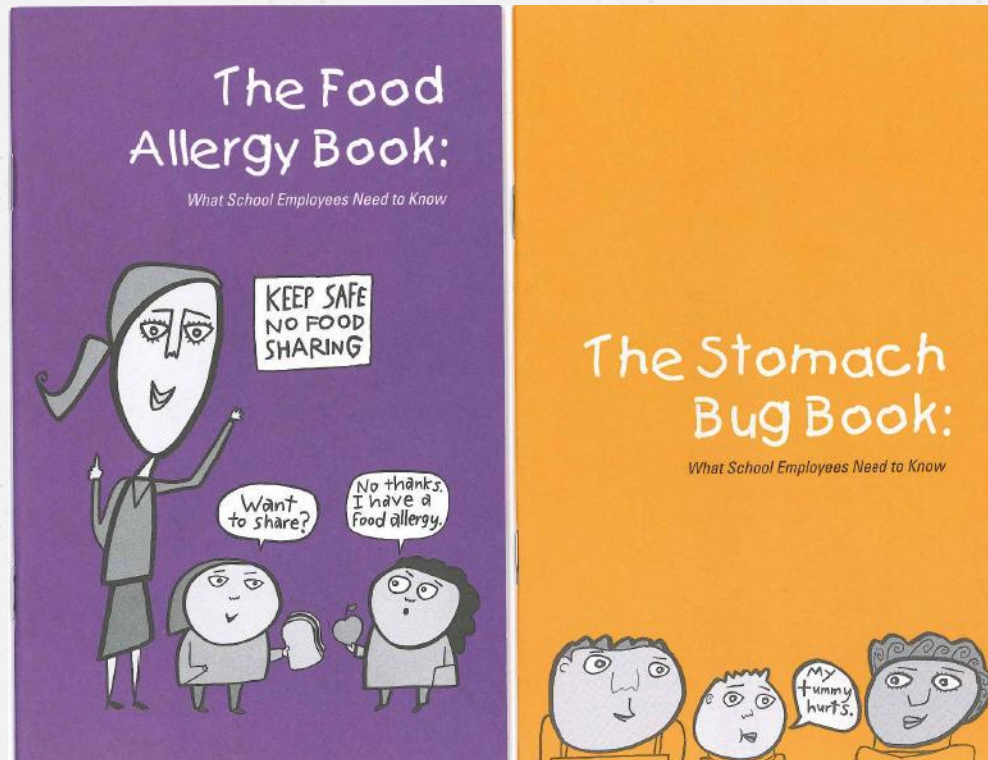




# Additional Training Materials Available

- o NFSMI: <http://www.nfsmi.org/>
  - o Produce Safety University
- o Categorizing Menu Items According to Process Approach
- o USDA Food Safety Education
  - o [http://www.fsis.usda.gov/food\\_safety\\_education/food\\_safety\\_education\\_programs/index.asp](http://www.fsis.usda.gov/food_safety_education/food_safety_education_programs/index.asp)
- o Partnership for Food Safety Education
  - o <http://www.fightbac.org/>

# Additional Training Materials Available





# <http://www.nfsmi.org/resource/overview.aspx?ID=452>

## FOOD ALLERGY FACT SHEET

### Common Questions: Child Nutrition Directors

Is the school required to make accommodations for all students with food allergies?

To what length must school nutrition operations go to accommodate a child with a life-threatening allergy?

Is it considered a disability. A safe meal to the student which to consume the meal.

What should be done for students with a life-threatening allergy, where

student with allergies more so. Extra expenses can be

## FOOD ALLERGY FACT SHEET

### Common Questions: Child Nutrition Staff

What should I do if I make an error when preparing food for a student with a food allergy?

If you make an error as quickly notify the school.

What should be done if an allergy complaint is fine?

Take all complaints seriously. Notify the school.

How can I be prepared if a student has a severe allergic reaction?

## FOOD ALLERGY FACT SHEET

### Managing Food Allergies: Child Nutrition Staff

#### 1. Know your district or school food allergy policy.

- Read your district or school food allergy policy.
- Understand your role in keeping students with food allergies safe.
- Know how to activate the school's emergency action plan if a student has a severe allergic reaction.

#### 2. Be familiar with each student's medical statement and Food Allergy Action Plan/Emergency Plan.

- Follow the instructions in the student's medical statement.
- Understand each student's Food Allergy Action Plan/Emergency Plan.
- Seek clarification from the parent/guardian if the medical statement is unclear.
- Know your school's system to identify students who have food allergies.
- Keep all student information confidential.

#### 3. Read ingredient labels to check for allergens (foods).

- Most ingredient labels list the top eight foods causing allergic reactions: eggs, peanuts, tree nuts, wheat, soy, fish, and crustacean shellfish.
- Check labels for warning statements such as "may contain," "produced in a plant that uses." These foods should not be served if the label is unclear.
- Check labels for allergens on every product each time the product is used.
- Maintain labels for a minimum of 24 hours after the food is served.

#### 4. Avoid cross-contact when preparing and serving food.

- Wash hands with soap and water before and after each task. Use gloves when handling food.
- Wash, rinse, and sanitize all cookware before and after each use.
- Clean and sanitize all food contact surfaces.
- Designate an allergy-free zone in the kitchen. When working with allergens, use separate equipment and utensils.
- Follow standardized recipes exactly as written.
- Use serving utensils and gloves designated for allergen-free food.
- Clean and sanitize tables and chairs before and after each meal.



## FOOD ALLERGY FACT SHEET

### Overview of Food Allergies

#### What is a food allergy?

A food allergy is when the body mistakenly reacts to a certain food or ingredient as if it were harmful. The food that causes the reaction is called an allergen.

#### What are the symptoms of a food allergy reaction?

Symptoms can happen within a few minutes or up to a few hours of the allergen being eaten and can be seen or felt in different parts of the body.

- Skin rash or eczema
- Swelling of the tongue or throat and difficulty breathing
- Itching in the mouth and throat, cramps, nausea, diarrhea, and/or vomiting
- Drop in blood pressure and loss of consciousness
- Death

#### What is anaphylaxis?

Anaphylaxis is a serious reaction that happens quickly.



#### How are food allergies diagnosed?

A doctor can diagnose food allergies by using a variety of tests.

If a school or district does not currently have one, develop a food allergy emergency plan that addresses allergic reactions into your school's emergency plan.

Individual students with food allergies.

For students with food allergies, the school nurse and parents, to obtain a medical statement and an action plan for the student with allergies. (See *Accommodating School Nutrition Programs: Guidance for School Food Service* at [www.fda.gov/oc/ohrt/special\\_dietary\\_needs.pdf](http://www.fda.gov/oc/ohrt/special_dietary_needs.pdf)).

Procedures for school nutrition. Follow the U.S. Department of Agriculture (USDA) regulations regarding procedures for food allergy compliance.

While keeping information confidential regarding students with food allergies, the school should provide allergen-free meals, and food prepared for field trips to parents/teachers. Avoid serving food, drinks, straws, or utensils that may contain allergens. Use standardized recipes to prevent cross-contact.

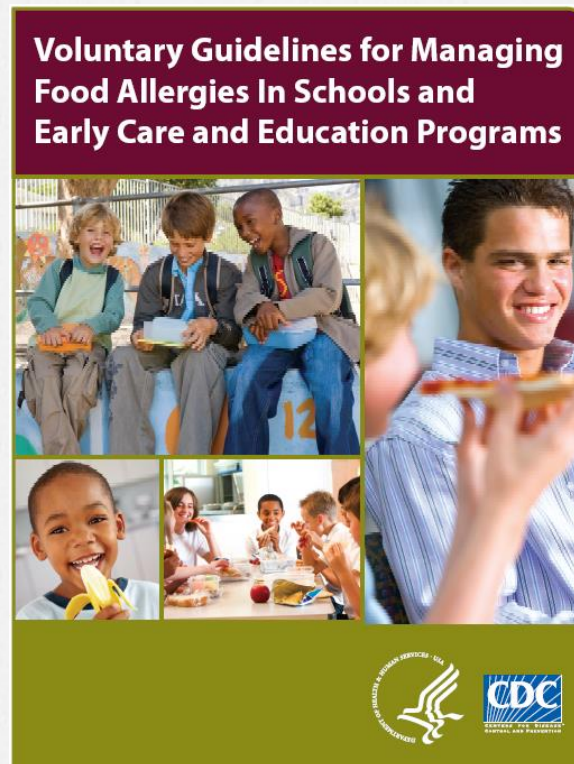
After food is served, the school should obtain food ingredient information. For more information, visit the federal government's food safety Web site: [www.recalls.gov](http://www.recalls.gov).





# NEW CDC Voluntary Guidelines for Managing Food Allergies in Schools and Early Care and Education Programs

◦ <http://www.cdc.gov/healthyyouth/foodallergies/>



[http://www.fns.usda.gov/fns/safety/pdf/best\\_practices.pdf](http://www.fns.usda.gov/fns/safety/pdf/best_practices.pdf)



# BEST PRACTICES

## HANDLING FRESH PRODUCE IN SCHOOLS



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Advancing **food safety**  
in **child nutrition**  
programs



# What's in the Administrative Review re: Food Safety?

- o MI SNP Analysts are not licensed health inspectors
- o Required to monitor the following for compliance:
  - o Written food safety plan for compliance with HACCP program criteria
  - o Determine if 2 food safety inspections have been obtained
  - o Confirm the posting of the most recent food safety inspection report
  - o Verify compliance with HACCP and local/state health standards
  - o Check temperature logs to ensure proper record keeping
  - o Examine on-site food storage for dates and conditions of foods
  - o Examine the procedures in place for accommodating students with special dietary needs

# Monitor:

## Written food safety plan

- o The written food safety plan will be examined for the required elements
  - o Follows process approach & HACCP principles
  - o Covers all facilities that store, prepare or serve food for FNS programs
  - o Accessible at, and appropriate to, each site
  - o On-site observation of food safety plan implementation
    - o Is cross contamination prevented, are temperatures monitored, are staff knowledgeable of the plan, etc.

# Monitor:

## Food safety inspections

- o Each participating school must receive at least two food safety inspections each school year
  - o Performed by local health department
    - o 2 inspection dates are noted during review
  - o If LHD denies an inspection, documentation of denial is maintained
  - o Most recent results are posted in a publicly visible location



# Monitor:

## Recordkeeping & Storage

- o FNS requires each school in the SFA maintain temperature logs for a period of six months
  - o During the on-site visit, the SNP Analyst is required to review the temperature logs for one day within the past 6 months
- o MDE is required to ensure that facilities for handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage and other loss

# Monitor:

## Special dietary needs

- FNS requires each SFA to be knowledgeable of the requirements for students with special dietary needs
- SNP Analysts will assess your understanding of these requirements

# Local Wellness Policy (LWP)

- 2005-2006 Local Wellness Policy Administrative Policy #3
- Child Nutrition Reauthorization 2010: Local Wellness Policies
- USDA Local Wellness Policy – <http://www.fns.usda.gov/tn/healthy/wellnesspolicy.html>
- MDE SBE Model Local Wellness Policy - [http://www.michigan.gov/documents/Policy\\_on\\_Wellness\\_141434\\_7.pdf](http://www.michigan.gov/documents/Policy_on_Wellness_141434_7.pdf)



# Local School Wellness Policies in Administrative Review

- All SFAs MUST have a LWP that includes:
  - Goals for nutrition education, physical activity, nutrition promotion, and other school-based activities to promote student wellness
  - Steps for implementation, transparency, public input, availability

# Questions

- Contact MDE School Nutrition Programs
  - Phone: 517-373-3347
  - or*
  - E-mail: [MDE-SchoolNutrition@michigan.gov](mailto:MDE-SchoolNutrition@michigan.gov)

